



1 commerce by any means, including by computer, knowing that the images  
2 were child pornography.

3 The child pornography that defendant KHA possessed on the silver  
4 32 GB Samsung flash drive included, but was not limited to, the  
5 following image files:

- 6 1) "ilovecphfjziywno.onion\_062.jpg"; and
- 7 2) "ilovecphfjziywno.onion\_066.jpg."

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1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 2253]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 2253, in the event of the defendant's  
7 conviction of the offense set forth in this Indictment.

8 2. The defendant, if so convicted, shall forfeit to the United  
9 States of America the following property:

10 (a) All right, title, and interest in any visual depiction  
11 involved in any such offense, or any book, magazine, periodical, film  
12 videotape, or other matter which contains any such visual depiction,  
13 which was produced, transported, mailed, shipped or received and  
14 involved in such offense;

15 (b) All right, title, and interest in any property, real  
16 or personal, constituting or traceable to gross profits or other  
17 proceeds obtained from such offense;

18 (c) All right, title, and interest in any property, real  
19 or personal, used or intended to be used to commit or to promote the  
20 commission of such offense or any property traceable to such  
21 property; and

22 (d) To the extent such property is not available for  
23 forfeiture, a sum of money equal to the total value of the property  
24 described in subparagraphs (a), (b), and (c).

25 3. Pursuant to Title 21, United States Code, Section 853(p),  
26 as incorporated by Title 18, United States Code, Section 2253(b), the  
27 defendant, if so convicted, shall forfeit substitute property, up to  
28 the total value of the property described in the preceding paragraph

1 if, as the result of any act or omission of the defendant, the  
2 property described in the preceding paragraph, or any portion  
3 thereof: (a) cannot be located upon the exercise of due diligence;  
4 (b) has been transferred, sold to or deposited with a third party;  
5 (c) has been placed beyond the jurisdiction of the court; (d) has  
6 been substantially diminished in value; or (e) has been commingled  
7 with other property that cannot be divided without difficulty.

8 A TRUE BILL  
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10 /S/  
11 Foreperson

12 E. MARTIN ESTRADA  
United States Attorney

13 MACK E. JENKINS  
Assistant United States Attorney  
Chief, Criminal Division



14 SCOTT M. GARRINGER  
Assistant United States Attorney  
Deputy Chief, Criminal Division

15 IAN V. YANNIELLO  
Assistant United States Attorney  
Deputy Chief, General Crimes  
Section

16 ANGELA C. MAKABALI  
Assistant United States Attorney  
Cyber and Intellectual Property  
Crimes Section